

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CARMEN FLORES,)	
)	Case No. 07 C 6403
Plaintiff,)	
)	Judge Hibbler
v.)	
)	Magistrate Judge Valdez
DIAMOND BANK,)	
)	
Defendant.)	

**PLAINTIFF’S MOTION FOR AN EXTENSION OF TIME TO FILE A REPLY IN
FURTHER SUPPORT OF HER MOTION FOR CLASS CERTIFICATION**

Plaintiff respectfully requests that this Court extend the time for her Reply in Further Support of Her Motion for Class Certification, stating as follows:

1. Plaintiff’s Reply is currently due on July 28, 2008.
2. Over the course of the last 14 days, since the date Defendant filed its Response to Plaintiff’s Motion, Plaintiff’s counsel has had a variety of other briefing matters arise, which necessitate this extension request.
3. For instance, counsel has had to draft, among others:
 - (a) A Response to Barrington Motor Sales and Service, Inc.’s Motion to Dismiss in *Semitek v. Monaco Coach Corporation, et al.*, Case No. 06 C 6424, pending in the U.S. District Court for the Northern District of Illinois, Eastern Division;
 - (b) A Response to Monaco Coach Corporation’s Motion to Dismiss in *Semitek v. Monaco Coach Corporation, et al.*, Case No. 06 C 6424, pending in the U.S. District Court for the Northern District of Illinois, Eastern Division;
 - (c) A Response to Caterpillar, Inc.’s Motion to Dismiss in *Semitek v. Monaco Coach Corporation, et al.*, Case No. 06 C 6424, pending in the U.S. District Court for the Northern District of Illinois, Eastern Division;

- (d) A Response to Dometic Corporation's Motion to Dismiss in *Semitek v. Monaco Coach Corporation, et al.*, Case No. 06 C 6424, pending in the U.S. District Court for the Northern District of Illinois, Eastern Division;
- (e) Preliminary approval class action settlement materials in *Olszowka v. Village of Chicago Ridge*, Case No. 07 C 6115, pending in the U.S. District Court for the Northern District of Illinois, Eastern Division;
- (f) Preliminary approval class action settlement materials in *Ector v. City of Markham*, Case No. 07 C 6116, pending in the U.S. District Court for the Northern District of Illinois, Eastern Division;
- (g) Motion for Summary Judgment in *Berg v. Inovision, et al.*, Case No. 07 C 4887, pending in the U.S. District Court for the Northern District of Illinois, Eastern Division; and
- (h) A Response to Defendants' Motion to Dismiss in *Safir v. Tracy's Treasures, Inc., et al.*, Case No. 06 CH 11047, pending in the Circuit Court of Cook County, Chancery Division.

4. Due to these matters, Plaintiff request an additional twenty-one (21) days to file her Reply in Further Support of Her Motion for Class Certification.

5. This motion is not brought for any improper purpose or to needlessly delay this case, but to allow Plaintiff to adequately reply to the points raised in Defendant's Opposition to Plaintiff's Motion for Class Certification.

WHEREFORE, Plaintiff respectfully request that she be granted an additional twenty-one (21) days to file her Reply in Further Support of Plaintiff's Motion for Class Certification, up and including August 18, 2008.

Respectfully submitted,

By: /s/ Lance A. Raphael
One of Plaintiff's Attorneys

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